

DECLARATION OF JOHN O. MILLER

I, John O. Miller, declare as follows:

1. I am over 21 years of age, of sound mind, and competent to make this Declaration. I have personal knowledge of the matters contained herein and they are all true and correct. If called to testify I could and would completely testify as follows:

2. I reside in Patterson, New York. I am an attorney, licensed in the States of New York and Texas, and serve as Associate General Counsel in the Legal Department of Watchtower Bible and Tract Society of New York, Inc.

3. As an attorney, I am responsible for certain litigation matters, including working on the Lewis v. Watchtower et al lawsuits.

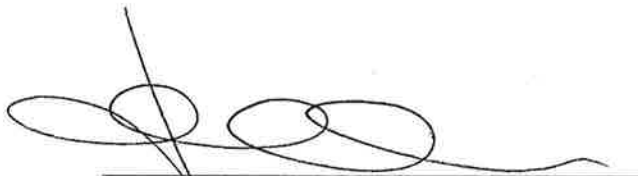
5. I have personal knowledge of the documents at issue generated and maintained by the Watchtower Legal Department. I regularly take calls from elders who seek legal advice on the state law duty to report to local authorities, and I disseminate such legal advice, similar to that which is reflected in the documents that are at issue in this motion.

6. I am also familiar with the attached records of the Vermont State Police concerning the allegations of Melinda and Annessa Lewis against Norton True, which were produced by Norton True in discovery in the related lawsuit of Miranda Lewis v. Bellows Falls Congregation et al, Docket No. 548-10-14 Wrcv pending in the State of Vermont, Windsor Superior Court, Civil Division. The police report True provided bear document numbers True0124-True0145, and is attached hereto as Exhibit D.

7. I am familiar with the Letter to all Bodies of Elders dated March 14, 1997, a true and correct copy of which is attached hereto as Exhibit "E."

I declare under penalty of perjury of the laws of the State of New York that the foregoing is true and correct.


Executed on October, 12th, 2015 at PATTERSON, New York.



John O. Miller, Declarant

STATE OF NEW YORK
COUNTY OF PUTNAM

Subscribed and sworn to before me this 12TH day of October, 2015.



Notary Public
Commission Expires: 05/01/2019

DONNA S. REIMER
Notary Public, State of New York
No. 4950436
Qualified in Putnam County
Commission Expires 05/01/2019